

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION

GALDERMA LABORATORIES, L.P. §  
and GALDERMA S.A., §  
Plaintiffs-Counterclaim Defendants, §  
v. § CIVIL NO. 4:06-CV-00471-Y  
ACTAVIS MID ATLANTIC LLC, § ECF  
Defendant-Counterclaim Plaintiff. §

**STIPULATION FOR DISMISSAL WITHOUT PREJUDICE**

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), Plaintiffs Galderma Laboratories, L.P., and Galderma S.A. and Defendant Actavis Mid Atlantic, L.L.C., through their respective counsel, file this Stipulation for Dismissal Without Prejudice, as follows:

1. This action and claims and counterclaims brought herein are dismissed without prejudice.
2. Each party shall bear its own costs and fees.
3. Notwithstanding the dismissal, the Court retains jurisdiction over this matter for the purposes of enforcing the parties' settlement agreement should any disputes arise under that agreement.

Respectfully submitted,

*s/Jamil N. Alibhai* \_\_\_\_\_

Michael C. Wilson  
Texas State Bar No. 21704590  
Jamil N. Alibhai  
Texas State Bar No. 00793248  
Daniel E. Venglarik  
Texas State Bar No. 00791851  
**MUNCK CARTER, P.C.**  
600 Banner Place Tower  
12770 Coit Road  
Dallas, Texas 75251  
Telephone: (972) 628-3600  
Facsimile: (972) 628-3616

**ATTORNEYS FOR PLAINTIFFS/  
COUNTER-DEFENDANTS  
GALDERMA LABORATORIES, L.P.  
AND GALDERMA S.A.**

**OF COUNSEL:**

David H. Bernstein, Esq.  
Carl Riehl, Esq.  
DEBEVOISE & PLIMPTON LLP  
919 Third Ave.  
New York, NY 10022  
Telephone: (212) 909-6000  
Facsimile: (212) 909-6836

*s/ Steven M. Amundson* \_\_\_\_\_

Edgar H. Haug, Esq.  
Steven M. Amundson, Esq.  
FROMMER LAWRENCE & HAUG, LLP  
745 Fifth Ave.  
New York, NY 10151  
Telephone: (212) 588-0800  
Facsimile: (212) 588-0500

*And*

Jay K. Rutherford, Esq.  
Texas State Bar No. 17451200  
Amanda L. Bush, Esq.  
Texas State Bar No. 24042161  
JACKSON WALKER, L.L.P.  
301 Commerce St., Suite 2400  
Ft. Worth, Texas 76102  
Telephone: (817) 334-7200  
Facsimile: (817) 334-7290

**ATTORNEYS FOR DEFENDANT/  
COUNTER-PLAINTIFF ACTAVIS  
MID ATLANTIC, L.L.C.**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of this instrument was served upon counsel of record via ECF on December 24, 2008.

*s/ Jamil N. Alibhai* \_\_\_\_\_